

**United States Bankruptcy Court
Southern District of Texas**

In re: **CLINT ARLIN CHURCH**

Case No. **22-30914-H4-13**

Debtor

Chapter: 13

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM THE STAY
FILED BY FREEDOMROAD FINANCIAL**

COMES NOW, Clint Arlin Church, and files this, his Response to Motion for Relief from the Stay filed by FreedomRoad Financial ("Motion for Relief"), and respectfully shows the Court the following:

1. Debtor admits the allegations contained in paragraph 1 of the Motion for Relief.
2. Debtor admits the allegations contained in paragraph 2 of the Motion for Relief.
3. Debtor admits the allegations contained in paragraph 3 of the Motion for Relief.
4. Debtor cannot admit or deny the allegations contained in paragraph 4 of the Motion for Relief.
5. Debtor admits the allegations contained in paragraph 5 of the Motion for Relief.
6. Debtor admits the allegations contained in paragraph 6 of the Motion for Relief.
7. Debtor admits the allegations contained in paragraph 7 of the Motion for Relief.
8. Debtor cannot admit or deny the allegations contained in paragraph 8 of the Motion for Relief..
9. Debtor cannot admit or deny the allegations contained in paragraph 9 of the Motion for Relief since it is regarding an estimate.
10. Debtor cannot admit or deny the allegations contained in paragraph 10 of the Motion for Relief.
11. Debtor cannot admit or deny the allegations contained in paragraph 11 of the Motion for Relief.

12. Debtor cannot admit or deny the allegations contained in paragraph 12 of the Motion for Relief because that paragraph is inapplicable.
13. Debtor cannot admit or deny the allegations contained in paragraph 13 of the Motion for Relief because that paragraph is inapplicable.
14. Debtor admits the allegations contained in paragraph 14 of the Motion for Relief.
15. Debtor cannot admit or deny the allegations contained in paragraph 15 of the Motion for Relief because that paragraph is inapplicable.
16. Debtor cannot admit or deny the allegations contained in paragraph 16 of the Motion for Relief because that paragraph is inapplicable.
17. Debtor denies the allegations contained in paragraph 17 of the Motion for Relief.
18. Debtor admits the allegations contained in paragraph 18 of the Motion for Relief.

WHEREFORE, PREMISES CONSIDERED, Clint Arlin Church prays that this Court will deny the Motion for Relief From the Stay filed by FreedomRoad Financial and grant Debtors all relief he is entitled to under the Code, including attorneys' fees, if applicable.

Respectfully Submitted,

/s/ Rick J Deal

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CERTIFICATE OF SERVICE

I certify that the Debtor's Response to FreedomRoad Financial's Motion to Lift Stay in the above-referenced case was served, either by electronic means or by first class mail, on the parties listed below on September 27, 2022.

/s/ Rick J Deal

TRUSTEE

William E Heitkamp
Ch 13 Trustee
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US TRUSTEE

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CREDITOR

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